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21 **UNITED STATES DISTRICT COURT**  
22  
**DISTRICT OF NEVADA**

23 KARL HANSEN,

24 Case No. 3-19-cv-00413-LRH-WGC

25 Plaintiff,

26 vs.

27 ELON MUSK; TESLA, INC.; TELSA  
28 MOTORS, INC.; U.S. SECURITY  
ASSOCIATES; DOES 1 THROUGH 50,

29 **STIPULATION TO STAY PRETRIAL  
DEADLINES**

30 Defendants.

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41 Attorneys for Defendant  
42 U.S. SECURITY ASSOCIATES

1 Pursuant to LR IA 6 of the Local Rules of Practice for the District Court for the District of  
 2 Nevada, Plaintiff Karl Hansen and Defendants Elon Musk (“Musk”), Tesla, Inc., Tesla Motors, Inc.  
 3 (collectively the “Tesla Parties”), and U.S. Security Associates (“USSA”) (collectively “Parties”)  
 4 by and through their respective counsel, hereby stipulate and jointly move this Court to stay the  
 5 remaining deadlines set forth in the Court’s Amended Scheduling Order of March 23, 2020  
 6 (Docket Entry “D.E.” 43) in light of the following:

7 On February 27, 2020, the Tesla Parties filed a motion to compel arbitration. (D.E. 39.) On  
 8 March 10, 2020, Plaintiff filed an opposition to the Tesla Parties’ motion to compel arbitration.  
 9 (D.E. 40.) On March 17, 2020, the Tesla Parties filed a reply in support of their motion to compel  
 10 arbitration. (D.E. 41.) On March 27, 2020, USSA filed a motion to compel arbitration. (D.E. 44.)  
 11 On April 7, 2020, Plaintiff filed an opposition to USSA’s motion to compel arbitration. (D.E. 45.)  
 12 On April 14, 2020, USSA filed a reply in support of their motion to compel arbitration. (D.E. 47.)  
 13 This Court’s ruling on the motions to compel arbitration will potentially change the scope and  
 14 procedural posture of this matter.

15 As further grounds, on April 17, Plaintiff filed a motion to compel Defendants’ written  
 16 discovery responses. (D.E. 48.) On May 1, the Defendants filed oppositions to Plaintiff’s motion  
 17 to compel discovery in light of the pending motions to compel arbitration. (D.E. 50, 51.)

18 WHEREFORE, the Parties hereby stipulate and respectfully move this Court to enter an  
 19 Order staying the remaining deadlines set forth in its March 20, 2020 Order pending resolution of  
 20 the pending motions to compel arbitration and compel discovery.

21 Jointly and respectfully submitted:

22 Dated: June 4, 2020

THE EMPLOYMENT LAW GROUP

23 \_\_\_\_\_/s/  
 24 Nicholas Woodfield

25 -and-

26 \_\_\_\_\_/s/  
 27 Mark R. Thierman  
 Thierman Buck, LLP  
 28 Attorney for Karl Hansen

1 Date: June 4, 2020

SEYFARTH SHAW LLP

2

/s/

3 Christopher F. Robertson, Esq.

4

-and-

5

SKLAR WILLIAMS, PLLC

6

/s/

7

Crane M. Pomerantz, Esq.

8

*Attorneys for Elon Musk, Tesla, Inc., and  
Tesla Motors, Inc.*

9

10 Date: June 4, 2020

MARTENSON, HASBROUCK & SIMON LLP

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/s/

12

Jeremy T. Naftel

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-and-

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HOLLAND AND HART, LLP

15

/s/

16

Matt T. Cecil

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*Attorneys for U.S. Security Associates*

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19 IT IS SO ORDERED:

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UNITED STATES MAGISTRATE JUDGE

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DATED: June 5, 2020.

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